

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

BRANDON EHLIS, on behalf of himself  
and all others similarly situated,

Plaintiff

v.

DAP PRODUCTS, INC.,

Defendant

Case No. 0:20-cv-01872-PJS-ECW

**DECLARATION OF DAVID A.  
GOODWIN IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT DAP PRODUCTS  
INC.'S MOTION TO DISMISS**

I, David A. Goodwin, declare and state as follow:

1. I am over eighteen years of age, a citizen of the United States, and a resident of the State of Minnesota.

2. I have personal knowledge of the facts stated herein.

3. I am an attorney licensed to practice law in the state of Minnesota, and I am a partner at Gustafson Gluek PLLC.

4. In conjunction with co-counsel, Zimmerman Reed LLP, Gustafson Gluek PLLC represents Plaintiff Brandon Ehlis ("Plaintiff") in the above-captioned case.

5. Attached as Exhibit A is a true and correct copy of prelitigation demand letter sent by certified mail to Defendant DAP Products, Inc. dated July 28, 2020.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on this 11th day of December, 2020.



David A. Goodwin